

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RONALD MORGAN, as attorney-in-fact
for HELGA NEUSS,

Plaintiff,

vs.

SEABOURN CRUISE LINE LIMITED,

Defendant.

CASE NO: 2:20-cv-00770-BJR

STIPULATION AND ORDER TO
CONTINUE REBUTTAL EXPERT
DESIGNATION AND REPORTS; EXPERT
WITNESS DEPOSITION COMPLETION
DATE; AND LAST DAY TO FILE
DISPOSITIVE MOTIONS

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Defendant SEABOURN CRUISE LINE, LTD. and Plaintiff RONALD MORGAN, as attorney-in-fact for HELGA NEUSS, through their respective counsel of record, collectively (the “Parties”), hereby submit this joint Stipulation to continue the time to complete expert rebuttal reports/witnesses, expert depositions, and the last day to file dispositive motions, by one week each. The Parties assert that there is good cause to amend the Order Setting Trial Dates and Related Dates (Dkt. 13). The request is based on the following:

1. This action seeks damages resulting from the alleged personal injuries to Plaintiff Helga Neuss, who was a passenger aboard the SEABOURN QUEST cruise vessel when she allegedly suffered a stroke while on board. Plaintiff alleges that Seabourn was negligent in conducting the medical evacuation of Ms. Neuss, contributing to her injuries. The parties timely designated experts on February 8, 2021, which included neurologists, cruise ship physicians, and life care planners. Depositions of critical medical staff on the Seabourn Cruise ship (Dr. Gunzel, the treating physician and Nurse Venancio, the attending nurse) occurred on February 3rd and 4th, respectively. Despite multiple inquiries and demands, the reporter still has not completed the transcripts for these depositions. The one-week extension of deadlines is requested so that the parties’ experts can include this critical testimony in their rebuttal reports and to allow depositions and filing of motions accordingly, as follows:

Matter	Current Date	Proposed Date
Last day for rebuttal expert witnesses and reports	March 10, 2021	March 17, 2021
Last day for expert depositions	March 26, 2021	April 2, 2021
All dispositive motions must be filed by	April 9, 2021	April 16, 2021

2. The requested one-week continuance of the above dates will not interfere with any other dates set by the court. All other dates, including trial, will remain the same.

IT IS SO STIPULATED.

FOR PLAINTIFFS

Date: March 5, 2021

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FOR DEFENDANT

Date: March 5, 2021

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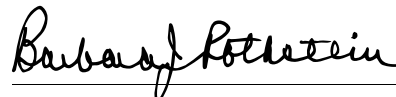
ORDER

The Court, having reviewed the stipulation of the parties (Dkt. No. 18), hereby

ORDERS:

1. The deadline for rebuttal expert witnesses and reports is extended to March 17, 2021.
2. The deadline for expert depositions is extended to April 2, 2021.
3. The deadline for filing dispositive motions is extended to April 16, 2021.

Dated: March 8, 2021



Barbara Jacobs Rothstein
U.S. District Court Judge